

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

SHADEESHA BROWN, et al.,	:	
	:	CIVIL ACTION
Plaintiffs,	:	
	:	
v.	:	No. 11 Civ. 1068 (AJN)
	:	
THE CITY OF NEW YORK, et al.,	:	
	:	
Defendants.	:	
	:	

DECLARATION OF MARTIN S. BLOOR

1. I am an attorney of the law firm Pepper Hamilton LLP, and am admitted to practice in the State of New York. I am an attorney of record for Defendants in the above-captioned action.

2. I submit this Declaration on behalf of Defendants in support of the Defendants' Reply in Further Support of Their Motion to Exclude the Testimony of Plaintiff's Expert Witness Dr. Marcia Knight.

3. Attached hereto at Exhibit A is, to my best knowledge, a true and correct copy of excerpts from the transcript of the June 13, 2012 deposition of Marcia Knight, Ph.D.

4. Attached hereto at Exhibit B is, to my best knowledge, a true and correct copy of the Psychological Report of Shadeesha Brown by Marcia Knight, dated October 12, 2010.

5. Attached hereto at Exhibit C is, to my best knowledge, a true and correct copy of excerpts from the transcript of the December 7, 2010 50-H hearing of Shadeesha Brown.

6. Attached hereto at Exhibit D is, to my best knowledge, a true and correct copy of excerpts from the transcript of the January 5, 2012 deposition of Shadeesha Brown.

7. Attached hereto at Exhibit E is, to my best knowledge, a true and correct copy of an excerpt authored by Marcia Knight, taken from *Earning a Living Outside of Managed Mental Health Care* (Steven Walfish ed., American Psychological Association 2010).

8. I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 17, 2013
In New York, New York

/s/ Martin S. Bloor
Martin S. Bloor